



0000013396

INTERVENTION

RECEIVED

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

2000 MAY 30 P 2:09

DOCKETED

CARL J. KUNASEK  
CHAIRMAN

JIM IRVIN

COMMISSIONER

WILLIAM A. MUNDELL

COMMISSIONER

MAY 30 2000

AZ CORP COMMISSION  
DOCUMENT CONTROL

DOCKETED BY

JM

IN THE MATTER OF THE APPLICATION  
OF NORTHERN STATES POWER  
COMPANY, A MINNESOTA  
CORPORATION, AND BLACK  
MOUNTAIN GAS, A SUBSIDIARY OF  
NORTHERN STATES POWER  
COMPANY, A MINNESOTA  
CORPORATION, TO DETERMINE  
EARNINGS FOR RATEMAKING  
PURPOSES, TO FIX A JUST AND  
REASONABLE RATE OF RETURN  
THEREON AND TO APPROVE RATE  
SCHEDULES DESIGNED TO DEVELOP  
SUCH RETURN FOR THE CAVE CREEK  
DIVISION.

Docket No. G-03703A-00-0283

### RUCO'S APPLICATION TO INTERVENE

#### I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in the above-captioned proceeding.

#### II.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461, *et seq.*, for the purpose of representing residential utility consumers in matters before the Commission concerning regulated public service corporations.

1 III.

2 Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of  
3 RUCO may do the following:

4 Prepare and present briefs, arguments, proposed rates or orders  
5 and intervene or appear on behalf of residential utility consumers  
6 before hearing officers and the Corporation Commission as a party  
7 in interest and also participate as a party in interest pursuant to  
8 Section 40-254 in proceedings relating to rate making or rate  
9 design and involving public service corporations.

10 IV.

11 The residential utility consumers of Northern States Power Company, will be directly  
12 and substantially affected by a Decision or Order of the Commission in this matter, therefore,  
13 it is necessary and proper that RUCO intervene in the proceeding.

14 V.

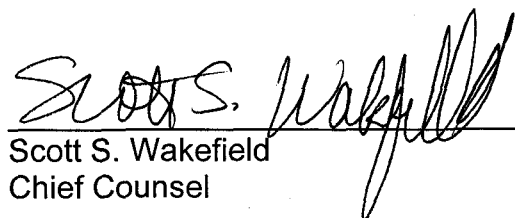
15 In order to fulfill its statutory obligation to protect the residential utility consumers of this  
16 State, RUCO must thoroughly examine the materials presented by the Company, and must  
17 cross-examine witnesses appearing on behalf of the Company and any other parties.  
18 Additionally, RUCO may present testimony and exhibits of its own in any hearings conducted  
19 by the Commission in this matter.

20 VI.

21 The name, mailing address, and telephone number of the person upon whom service of  
22 all documents is to be made is,

23 Scott S. Wakefield, Chief Counsel  
24 Residential Utility Consumer Office  
2828 North Central Avenue, Suite 1200  
Phoenix, Arizona 85004  
(602) 279-5659 ext. 349

1 RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of May, 2000.

2  
3   
4 Scott S. Wakefield  
Chief Counsel

5 AN ORIGINAL AND TEN COPIES  
6 of the foregoing filed this 30<sup>th</sup> day of  
7 May, 2000 with:

8 Docket Control  
9 Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

10 COPIES of the foregoing hand delivered/  
11 mailed this 30<sup>th</sup> day of May, 2000 to:

12 Jerry Rudibaugh, Chief Hearing Officer  
13 Hearing Division  
14 Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

15 Lyn Farmer, Chief Counsel  
16 Legal Division  
17 Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

18 Deborah Scott, Director  
19 Utilities Division  
20 Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

21 James H. Willson  
22 General Manager and Chief Executive Officer  
23 Black Mountain Gas Company  
24 6021 East Cave Creek Road  
Cave Creek, Arizona 85331

1 Timothy Berg, Esq.  
Fennemore Craig  
2 3003 North Central Avenue, Suite 2600  
Phoenix, Arizona 85012  
3

4  
5 By Cheryl Fraulob  
Cheryl Fraulob  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24